

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

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|----------------------------|---|------------------------|
| TONY AND MII'S, INC. | § | |
| TONY THANGSONGCHAROEN, and | § | |
| SOMNUEK THANGSONGCHAROEN | § | Case No. 3:17-cv-609-B |
| | § | |
| Plaintiffs, | § | |
| | § | |
| vs. | § | |
| | § | |
| UNITED STATES OF AMERICA, | § | |
| | § | |
| Defendant. | § | |

STIPULATED MOTION FOR MODIFICATION OF SCHEDULING ORDER

Plaintiffs, Tony and Mii's, Inc., Tony Thangsongcharoen, and Somnuek Thangsongcharoen, by and through undersigned counsel, and Defendant, United States of America, by and through undersigned counsel, hereby jointly move the Court for a modification of the Scheduling Order [Doc. #25], which currently provides for Designation of Experts by Plaintiff by August 3, 2018, and Designation of Experts by Defendants by September 4, 2018 [Doc. #25, pg. 2, ¶4]. The parties jointly request that these dates be extended to September 14, 2018, and October 19, 2018, respectively.

The parties have been engaged in discovery, including written discovery to each other, and various subpoenas to third parties. The parties do not request (and the requested extensions would not require) extension of any of the other dates in the Scheduling Order, including the Dispositive Motion Deadline (January 2, 2019), Completion of Discovery (December 3, 2018), the Mediation Deadline (November 2, 2018), or Challenges to Experts (January 31, 2019). The parties are not making this request for purposes of delay, but rather so they can further gather relevant information to provide to experts who may be issuing reports.

Respectfully submitted,

/s/ Curtis C. Smith
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CERTIFICATE OF SERVICE

It is hereby certified, that on September 11, 2018, I filed the foregoing using the Clerk's ECF system which will serve an electronic copy on the following:

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/s/Curtis C. Smith
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